

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
-vs-) NO. 2008 CR 106
)
RAYMIE HENDERSON,)
)
 Defendant.)

DEFENDANT'S MOTION FOR EARLY TERMINATION
OF SUPERVISED RELEASE

NOW COMES the Defendant, RAYMIE ("Ray") HENDERSON, by and through his attorney, ROBERT HABIB, and moves this Honorable Court to terminate his term of supervised release, and discharge him, pursuant to 18 U.S.C. Section 3583(e)(1), and Rule 32.1(c) of the Federal Rules of Criminal Procedure, and in support thereof, states as follows:

1. That the Defendant, Ray Henderson, after a jury trial, was convicted on 2 counts of Money Laundering, and on April 9, 2010 sentenced to 69 months, and 3 years of Supervised Release, and a fine of \$256.00.

2. That after a partially successful Appeal, his conviction on Count 2 was vacated by the Court of Appeals. Subsequently, Defendant's previous sentence of 69 months was reduced to 62 months.

3. That Defendant went into custody in June 4, 2010. After serving 48 months, he was released on June 4, 2014, and has been on Supervised Release since then. While a prisoner at Beckley Correctional Center he received recognition for his involvement and work for the Church. See Exhibit A.

4. That his term of Supervised Release is due to terminate in December, 2017.

5. Pursuant to 18 U.S.C. § 3583(e)(1), after considering the factors in Section 3553(a), the Court may "terminate a term of supervised release and discharge the defendant released at any time after the expiration of one year of supervised release, pursuant to the provisions of the Federal Rules of Criminal Procedure relating to the modification of probation, it is satisfied that such action is warranted by the conduct of the defendant released, and the interest of justice. ...".

6. That Defendant completed two years of supervised release.

7. Defendant has otherwise fully satisfied the terms of his sentence, and paid all outstanding financial penalties in full.

8. Defendant respectfully submits that early termination of the supervised release portion of his sentence is warranted by his conduct to date, and would be in the interests of justice. That Defendant has been a model citizen since his release from incarceration. That he is presently employed as an office

manager for Lebovic Realty located at 3924 W. Devon Ave,
Chicago, IL 60712.

9. Defendant is also a respected member of the Fellowship
Missionary Baptist Church, 45th & Princeton, where he, and his
family have attended for 10 years. Defendant has been
recognized for his work with the youth of the Church as shown by
the statement from Carl Jenkins, Pastor of the Church. Exhibit
B.

10. Finally, the Parole Officer, Bridget Gannon, has stated
she has no objection to the Defendant's early termination of
Probation.

WHEREFORE, Defendant, Ray Henderson, prays that this
Honorable Court terminate his term of Supervised Release, and
discharge him in the entirety.

/s/ Robert Habib
ROBERT HABIB

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